

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

(1) ANDREW CHABALLA, as
Next of Kin of LAVERNE
SOMERS, Deceased, and
ANDREW CHABALLA as
Administrator of the Estate of
LAVERNE SOMERS

Plaintiffs,

v.

(1) SP HEALTHCARE
MANAGEMENT LLC

(2) MIDWEST GERIATRIC
MANAGEMENT, LLC

(3) JUDAH BIENSTOCK

Defendants.

Case No. 5:22-cv-00772-F

DEFENDANTS' FINAL EXHIBIT LIST

COME NOW Defendants, SP Healthcare Management, LLC, Midwest Geriatric Management, LLC, and Judah Bienstock, collectively, "Defendants" and respectfully submit this final Exhibit list. Defendants reserve the right to modify this Exhibit list due to the fact that Discovery has not yet closed.

1. Medical Records of Decedent from South Pointe.
2. Medical Records of Decedent from Integris.
3. Medical records of Decedent from Southwest Medical Center.
4. Death certificate.
5. Andrew Chaballa handwritten note.

6. Medical Records of Decedent from Dr. Drew Cooper.
7. Plaintiff's written responses to Defendant's discovery.
8. South Pointe staffing records; including without limitation PBJ, handwritten staffing reports, and QORC reports.
9. South Pointe in-service records and signatures.
10. OHCA, Licensure files.
11. OHCA crystal reports.
12. OHCA Quality of Care reports.
13. OHCA Medicaid Cost reports.
14. Secretary of State Documents for MGM.
15. Secretary of State Documents for South Pointe.
16. Documents regarding ownership of South Pointe.
17. Documents regarding ownership of MGM.
18. South Pointe policies and procedures.
19. Lippincott Nursing Policies and Procedures.
20. South Pointe/MGM consulting agreement.
21. South Pointe employee policies.
22. Probate documents in case PB-2020-1237.
23. Criminal documents in case CF-2015-537.
24. Medical literature relied on by Dr. Robert Kelly.
25. Expert report of Robert Kelly, MD.
26. CV of Dr. Robert Kelly, MD.

27. All documents produced by the Plaintiff.
28. Any other documents produced and not objected to by Defendants.
29. Demonstrative exhibits, timelines, excerpts of records and anatomical records.
30. Evidence of payment of medical bills, via insurance and/or government sources including but not limited to, affidavits obtained pursuant to 12 O.S. §3009.1
31. Any and all X-rays, MRI's, CT's, radiographs or other diagnostic imaging or material taken of Laverne Somers.
32. Timeline of critical events
33. All depositions and exhibits attached thereto, not objected to by Defendants.
34. Demonstrative exhibits.

**DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.**

s/Brian M. Keester

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Certificate of Service

I hereby certify that on April 8, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/Brian M. Keester

Brian M. Keester

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